

Exhibit B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PATSY WIDAKUSWARA, et al.,

Plaintiffs,

-against-

KARI LAKE, et al.,

Defendants.

No. 25 Civ. 2390

SUPPLEMENTAL DECLARATION OF JOHN DRYDEN

I, John Dryden, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.
2. I am the president of the Voice of America Employees Union, Local 1418, District Council 20, American Federation of State, County and Municipal Employees, AFL-CIO (“AFSCME Local 1418” or “Union”).
3. At 10:50 p.m. EST on March 25, 2025, I received an email from the U.S. Agency for Global Media’s (USAGM) Director of Human Resources that included two attachments, a “Reduction in Force Notification” and an excel spreadsheet with data on the employees affected by the Reduction in Force (RIF). The notice states “This is a notice of management’s decision to implement a [RIF] for multiple competitive areas. The agency plans to send termination notices to employees in the next few weeks. Extraordinary circumstances, driven by the President’s March 14, 2025 executive order *Continuing the Reduction of the Federal Bureaucracy* and the need to provide clarity to employees necessitate a notification period shorter than three months.” The notice further states that

at least 29 AFSCME Local 1418 bargaining unit members will be affected by the RIF. A true and correct copy of this notice is attached hereto as Exhibit 1.

4. Also included in the email from the USAGM Human Resources Director is an excel spreadsheet with data on the 29 affected employees, which includes 23 Radio Broadcast Technicians (RBT) who work in Radio Studios and 6 who work in Radio Master Control. A true and correct copy of this document is attached hereto as Exhibit 2.
5. AFSCME Local 1418 represents a collective bargaining unit of approximately 32 employees in the position of RBT who work for USAGM at Voice of America (VOA), of which 26 work in Radio Studios and 6 work in Radio Master Control. To my knowledge, 3 members have submitted retirement applications.
6. If USAGM terminates the 29 listed employees and the 3 members referenced above retire, the entire bargaining unit of VOA RBTs will be eliminated. Without any RBTs to engineer radio programing, VOA will not be able to broadcast any live radio programing.
7. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed at Germantown, MD on the 26th day of March, 2025.

Signed by:

John Dryden
John Dryden

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EXHIBIT 1



330 Independence Ave SW, Washington, D.C. 20237

MEMORANDUM FOR AFSCME

FROM: CRYSTAL THOMAS
Director of Human Resources

DATE: March 25, 2025

SUBJECT: Reduction in Force Notification

This is a notice of management's decision to implement a reduction in force (RIF) for multiple competitive areas. The agency plans to send termination notices to employees in the next few weeks. Extraordinary circumstances, driven by the President's March 14, 2025 executive order *Continuing the Reduction of the Federal Bureaucracy* and the need to provide clarity to employees necessitate a notification period shorter than three months.

1. The reason for the reduction in force:

The President's March 14, 2025, executive order *Continuing the Reduction of the Federal Bureaucracy*. Statutory positions and functions will remain.

2. The approximate number of employees who may be affected initially:

Approximately 29 AFSCME bargaining unit employees, but this number is subject to change.

3. The competitive areas and levels that may initially be involved in a reduction in force:

See the accompanying attachment for the competitive areas and levels.

4. The anticipated effective date of the action.

Termination notices may be sent in the next few weeks, with a 60-calendar day period prior to the effective date.

EXHIBIT 2

Competitive Area	AFSCME
Washington, DC	29

Position ID

V170156
V170156
V170156
V170156
V170275
V170275
V170156
V170156
V170156
V170290
V170156
V170156
V170156
V170156
V170275
V170275
V170156
V170156
V170156
V170156
V170156
V170156
V170275
V170290
V170156
V170156
V170275
V170156

Position Title

V170156.RADIO BROADCAST TECHNICIAN.18660.IB00.APPR
V170156.RADIO BROADCAST TECHNICIAN.16457.IB00.APPR
V170156.RADIO BROADCAST TECHNICIAN.16234.IB00.APPR
V170156.RADIO BROADCAST TECHNICIAN.16246.IB00.APPR
V170275.MASTER RADIO BROADCAST TECHNICIAN.16525.IB00.APPR
V170275.MASTER RADIO BROADCAST TECHNICIAN.17102.IB00.APPR
V170156.RADIO BROADCAST TECHNICIAN.16241.IB00.APPR
V170156.RADIO BROADCAST TECHNICIAN.16452.IB00.APPR
V170156.RADIO BROADCAST TECHNICIAN.16238.IB00.APPR
V170290.RADIO BROADCAST TECHNICIAN BROADCAST TECHNICIAN.16557.IB00.APPR
V170156.RADIO BROADCAST TECHNICIAN.16441.IB00.APPR
V170156.RADIO BROADCAST TECHNICIAN.16455.IB00.APPR
V170156.RADIO BROADCAST TECHNICIAN.16440.IB00.APPR
V170156.RADIO BROADCAST TECHNICIAN.18633.IB00.APPR
V170275.MASTER RADIO BROADCAST TECHNICIAN.18230.IB00.APPR
V170275.MASTER RADIO BROADCAST TECHNICIAN.17414.IB00.APPR
V170156.RADIO BROADCAST TECHNICIAN.18835.IB00.APPR
V170156.RADIO BROADCAST TECHNICIAN.16237.IB00.APPR
V170156.RADIO BROADCAST TECHNICIAN.16720.IB00.APPR
V170156.RADIO BROADCAST TECHNICIAN.16498.IB00.APPR
V170156.RADIO BROADCAST TECHNICIAN.16236.IB00.APPR
V170156.RADIO BROADCAST TECHNICIAN.16449.IB00.APPR
V170156.RADIO BROADCAST TECHNICIAN.16450.IB00.APPR
V170275.MASTER RADIO BROADCAST TECHNICIAN.18783.IB00.APPR
V170290.RADIO BROADCAST TECHNICIAN BROADCAST TECHNICIAN.16554.IB00.APPR
V170156.RADIO BROADCAST TECHNICIAN.16451.IB00.APPR
V170156.RADIO BROADCAST TECHNICIAN.19037.IB00.APPR
V170275.MASTER RADIO BROADCAST TECHNICIAN.18391.IB00.APPR
V170156.RADIO BROADCAST TECHNICIAN.18707.IB00.APPR

Grade	Competitive Geo
WB-02	Washington, DC
WB-02	Washington, DC
WB-02	Washington, DC
WB-02	Washington, DC
WB-04	Washington, DC
WB-04	Washington, DC
WB-02	Washington, DC
WB-02	Washington, DC
WB-02	Washington, DC
WB-02	Washington, DC
WB-02	Washington, DC
WB-02	Washington, DC
WB-02	Washington, DC
WB-02	Washington, DC
WB-04	Washington, DC
WB-04	Washington, DC
WB-02	Washington, DC
WB-02	Washington, DC
WB-02	Washington, DC
WB-02	Washington, DC
WB-02	Washington, DC
WB-02	Washington, DC
WB-02	Washington, DC
WB-04	Washington, DC
WB-02	Washington, DC
WB-02	Washington, DC
WB-02	Washington, DC
WB-02	Washington, DC
WB-04	Washington, DC
WB-02	Washington, DC